

UNITED STATES DISTRICT COURT
(DISTRICT OF MASSACHUSETTS)

CIVIL ACTION NO. 05-11697 GAO

MARILYN KUNELIUS,)
Plaintiff,)
)
V.)
)
TOWN OF STOW separately, A)
PARTNERSHIP OF UNKNOWN NAME)
BETWEEN TOWN OF STOW and THE)
TRUST FOR PUBLIC LAND, THE)
TRUST FOR PUBLIC LAND separately)
and CRAIG A. MACDONNELL, in his)
individual capacity,)
Defendants.)
)

**PARTIALLY ASSENTED-TO PLAINTIFF'S EMERGENCY MOTION FOR
EXTENSION OF TIME TO SUBMIT THE PLAINTIFF'S EXPERT'S
CURRICULUM VITAE AND OPINION**

NOW COMES the Plaintiff with this Partially Assented-To Emergency Motion in connection with the submission of the Plaintiff's expert's curriculum vitae and opinion which is due today.

The Plaintiff's counsel was informed today that Plaintiff's expert Michael F. Hill, CPA, had suffered a broken wrist and was unable to complete the expert report for a submittal today. The Plaintiff's counsel is not available today and is out of the office, and has dictated this Motion by telephone call. The Plaintiff respectfully requests a 10-day extension to allow the Plaintiff's counsel to obtain the expert's curriculum vitae and opinion. Because this has been submitted by telephone, the Plaintiff's counsel had no opportunity to discuss the extent of the expert's injury.

My office has contacted all counsel involved in this case and asked them if they could assent to this Motion. It was only able to reach Attorney Deborah I. Ecker, who agreed to assent to this Motion. Attorney Dahlia S. Fetouh and Attorney James B. Conroy were out of the office today.

Respectfully submitted,

Marilyn Kunelius,

By her Attorney

Dated: May 4, 2007

By: /s/ Michael C. McLaughlin, Esq.
Michael C. McLaughlin BBO# 337350
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 4, 2007.

/s/ Michael C. McLaughlin, Esq.
Michael C. McLaughlin

CERTIFICATION UNDER LOCAL RULES 7.1

I, Michael C. McLaughlin, certify that on May 4, 2007, I have conferred with opposing counsel Attorney Deborah I. Ecker and have attempted in good faith to resolve and narrow the issue. I have attempted to confer with opposing counsel Attorney Dahlia S. Fetouh and Attorney James B. Conroy in good faith to resolve and narrow the issue, but was unable to reach them.

Dated: May 4, 2007

/s/ Michael C. McLaughlin, Esq.
Michael C. McLaughlin